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6 Plaintiff in Pro Per

7 UNITED STATES DISTRICT COURT  
8  
9 CENTRAL DISTRICT OF CALIFORNIA  
10

11 MARC WOLSTENHOLME,  
12 Plaintiff,  
13 vs.  
14 RIOT GAMES, INC.,  
15 Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

*Hon. Fernando M. Olguin*

DECLARATION OF MARC  
WOLSTENHOLME

PLAINTIFF'S SUPPLEMENTAL NOTICE  
REGARDING DISCOVERY AND SUDDEN  
DEPARTURE OF DEFENDANT'S  
COUNSEL

Dated this: March 17th, 2025

*M. WOLSTENHOLME*

[MARC WOLSTENHOLME]

Honorable Fernando M. Olguin

**TO THE COURT, DEFENDANT RIOT GAMES, INC., AND ITS  
COUNSEL OF RECORD:**

**INTRODUCTION**

Plaintiff Marc Wolstenholme submits this Supplemental Notice to inform the Court of new developments following the Plaintiff's previously filed discovery requests. Specifically, Plaintiff raises concerns regarding the sudden and unexplained departure of Defendant Riot Games, Inc.'s legal counsel Joshua Geller and Aaron Moss of Greenberg Glusker LLP immediately following key discovery-related disputes and filings. Plaintiff seeks the Court's intervention to ensure the integrity of discovery, prevent potential misconduct, and preserve all related evidence.

**FACTUAL BACKGROUND**

Discovery Requests Previously Filed: Plaintiff formally served discovery requests on Defendant Riot Games, Inc., seeking documents, communications, and other materials necessary for this case.

Misrepresentation & Settlement Conference Dispute: On March 12, 2025, Riot Games' counsel, Joshua Geller and Aaron Moss, made representations regarding the Court-

1 ordered settlement conference and the discovery process, which Plaintiff contended were  
2 misleading and an attempt to manipulate proceedings.

3           Plaintiff Challenges Procedural Conduct: Plaintiff responded by challenging  
4 Riot's failure to meet prerequisite requirements, procedural manipulation, and its lack of  
5 transparency regarding insurance disclosures, litigation strategy, and settlement conference  
6 intent.  
7

8           Sudden Departure of Counsel: On March 17, 2025, Plaintiff received an  
9 automated response from Greenberg Glusker LLP stating that both Joshua Geller and Aaron  
10 Moss were no longer with the firm.  
11

12           Potential Impact on Discovery & Litigation Integrity: The abrupt departure of  
13 these attorneys immediately following discovery disputes raises serious concerns, including:

14           Whether prior discovery responses, statements, or legal arguments made by these  
15 attorneys contain misrepresentations or bad-faith legal tactics.  
16

17           Whether relevant case materials (emails, documents, communications) have been  
18 properly preserved.

19           Whether this departure was linked to misconduct, ethical violations, or other  
20 procedural concerns.  
21

## 22           **REQUEST FOR COURT INTERVENTION**

23           Given the critical timing of this development, Plaintiff requests the Court's  
24 immediate intervention to ensure the integrity of discovery and litigation by:  
25

**CONFIRMATION OF ATTORNEY DEPARTURE REASONING**

Plaintiff requests that Riot Games and Greenberg Glusker LLP confirm in writing whether the departure of Joshua Geller and Aaron Moss was linked to misconduct, ethical concerns, or conflicts of interest in this litigation.

Plaintiff requests that Riot Games disclose who will now serve as lead counsel and whether this transition affects prior legal filings, discovery responses, or defense strategy.

**LITIGATION HOLD ON ATTORNEY COMMUNICATIONS &  
DISCOVERY MATERIALS**

Plaintiff formally demands a litigation hold on all communications, emails, documents, and internal correspondence involving Joshua Geller and Aaron Moss, including:

Their involvement in discovery responses and any misrepresentations made to the Court.

All communications with Riot Games and third parties regarding this case.

Any discussions or records related to their sudden departure from Greenberg Glusker LLP.

Any communications or instructions regarding procedural delays or misrepresentations to the Court.

**DISCLOSURE OF RIOT’S INTENTIONS REGARDING DISCOVERY**

**COMPLIANCE**

Riot Games must confirm its ongoing compliance with all discovery obligations despite this sudden legal transition.

Riot must reaffirm that all prior statements, responses, and filings remain valid and free of procedural manipulation.

**CONCLUSION**

The timing of these departures raises serious concerns about the integrity of prior filings, responses, and Riot’s legal strategy in this case. Plaintiff urges the Court to take immediate action to protect the discovery process, prevent spoliation of evidence, and hold Defendant accountable for any misconduct.

Failure to comply with these requests may result in further legal action, including motions for sanctions or requests for evidentiary hearings to determine whether misconduct or misrepresentations have occurred.

**Declaration**

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on March 17, 2025, in Coventry, England.

Signature: *M. WOLSTENHOLME*

Marc Wolstenholme

Plaintiff in Pro Per

5 Shetland Close

Coventry, England CV5 7LS

[marc@mwwolf-fiction.co.uk](mailto:marc@mwwolf-fiction.co.uk)

# Exhibits

## EXHIBIT A- SUDDEN DEPARTURE OF DEFENDANT'S COUNSEL

Automatic reply: ADR attempts- Without prejudice save as to costs- Final OFC offer.

External

Inbox

Search for all messages with label Inbox

Remove label Inbox from this conversation

Summarise this email

G

**Geller, Joshua**

19:28 (27  
minutes  
ago)

to me

Josh Geller is no longer with the firm. Please contact Liz Moriarty at [lmoriarty@greenbergglusker.com](mailto:lmoriarty@greenbergglusker.com) should you have any questions.

M

**Moss, Aaron**

19:28 (27  
minutes  
ago)

to me

Aaron Moss is no longer with the firm. Please contact Liz Moriarty at [lmoriarty@greenbergglusker.com](mailto:lmoriarty@greenbergglusker.com) should you have any questions.

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PLAINTIFF'S SUPPLEMENTAL NOTICE REGARDING DISCOVERY AND SUDDEN DEPARTURE OF  
DEFENDANT'S COUNSEL

**Aaron J. Moss**

Attorney at Law

[Biography](#) | [vCard](#)

310.785.6814 Direct

[amos@greenbergglusker.com](mailto:amos@greenbergglusker.com)

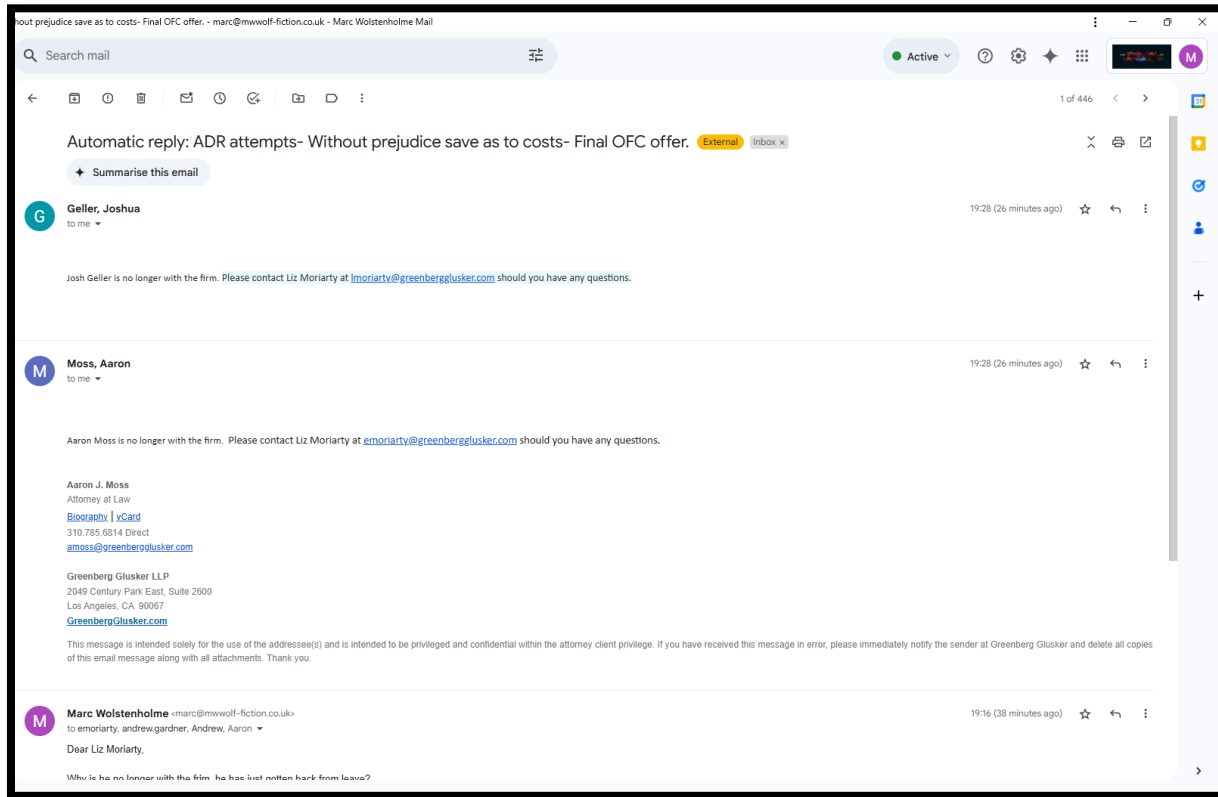
**Greenberg Glusker LLP**

2049 Century Park East, Suite 2600

Los Angeles, CA 90067

[GreenbergGlusker.com](http://GreenbergGlusker.com)

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PLAINTIFF'S SUPPLEMENTAL NOTICE REGARDING DISCOVERY AND SUDDEN DEPARTURE OF  
DEFENDANT'S COUNSEL



**EXHIBIT B- DISCOVERY REQUESTS**

**PLAINTIFF'S FIRST SET OF DISCOVERY REQUESTS**

Summarise this email

**M**

**Marc Wolstenholme** <marc@mwwolf-fiction.co.uk>

Fri 14 Mar,  
12:14 (3 days  
ago)

to Joshua, Aaron, dan.chang, Andrew, andrew.gardner

Dear Riot Games,

Please see attached - PLAINTIFF'S FIRST SET OF DISCOVERY REQUESTS

Have a great weekend,

If you want to chat, you have my details,

Marc Wolstenholme

**One attachment** • Scanned by Gmail

**M**

**Marc Wolstenholme** <marc@mwwolf-fiction.co.uk>

Fri 14 Mar,  
12:24 (3 days  
ago)

to Joshua, Aaron, dan.chang, Andrew, andrew.gardner

Dear All,

Please see attached-

**PLAINTIFF'S PROOF OF SERVICE- PLAINTIFF'S FIRST SET OF DISCOVERY REQUESTS**

**9**

PLAINTIFF'S SUPPLEMENTAL NOTICE REGARDING DISCOVERY AND SUDDEN DEPARTURE OF  
DEFENDANT'S COUNSEL

1 **One attachment • Scanned by Gmail**

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4 *M. WOLSTENHOLME*  
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